

# Federal Communications Commission Office of Engineering and Technology Laboratory Division

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# GENERAL GUIDELINES FOR LABELING AND OTHER INFORMATION REQUIRED TO BE PROVIDED TO USERS

#### 1. INTRODUCTION

General equipment labeling requirements are found in Part 2 Subpart J. Additional requirements for device labeling, information to users or information required to be displayed for specific to RF devices is specified in the applicable rule part for the RF device (*e.g.*, Sections 15.19, 15.105). The labeling and compliance information required for a given product is based on the equipment authorization procedure prescribed in the specific FCC rules that apply to the product.

The Commission has two equipment authorization procedures: Supplier's Declaration of Conformity (SDoC),<sup>2</sup> and certification.<sup>3</sup> The applicable FCC rules for the RF device being authorized specifies the equipment authorization procedure to be used. The label requirements for the RF device depends on the type of equipment authorization used.

Many of today's products are composite devices that include both radio transmitter(s) and digital circuitry. For these devices SDoC may be used for the digital circuitry portion of the device and certification for the transmitter portion. However, certification may be used to demonstrate compliance for both the transmitter and digital circuitry portions.

Appendix A provides a non-exhaustive list of compliance information requirements and information-to-end user.

## 2. SUPPLIER'S DECLARATION OF CONFORMITY (SDoC)

## 2.1 Product Identification

The product identification (labeling) and compliance information requirements for a device subject to SDoC (Sections 2.1074 and 2.1077, respectively) requires that each device be uniquely identified (for example, using a label listing a trade name and type or model number), and that end-users must be

<sup>&</sup>lt;sup>1</sup> See 47 CFR §§ 15.19 and 15.105.

<sup>&</sup>lt;sup>2</sup> See 47 CFR §§ 2.906 et seq.

<sup>&</sup>lt;sup>3</sup> See 47 CFR §§ 2.907 et seq.

<sup>&</sup>lt;sup>4</sup> FCC 96-208, docket no. 95-19, 11 FCC Rcd 17928, "28. Decision. As proposed, we are replacing the existing FCC ID label on personal computing equipment with a new, simplified label that includes a compliance logo. ... Consistent with our existing rules, we are also requiring that the new labels for computing devices uniquely identify the product with a trade name and type or model number. ..."

provided with a compliance information statement for the product.<sup>5</sup>

The unique identifier is any means to positively associate the device with the compliance test reports and records for a specific product approved using the SDoC procedure.<sup>6</sup> This may be a trade name and type number, model number, serial number, or other means employed utilizing the responsible party's internal manufacturing process.

## 2.2 Compliance Information

A compliance information statement that includes the following items (Section 2.1077(a)) must be supplied with the product at the time of marketing or importation:<sup>7</sup>

- Identification of the product, e.g., trade name, model, etc.
- A statement that the product complies with the rules, as applicable;8; and
- The name and address, and telephone number, or internet contact information of the responsible party's (as defined in Section 2.909(b)) contact located in the United States.<sup>9</sup>

## 2.3 Compliance Information for Assembled Products

Further to Section 2.1077(b), the following items apply to products: (1) assembled from modular components (*e.g.*, enclosures, power supplies and CPU boards) that, by themselves, are authorized under SDoC and/or a grant of certification; and (2) where the assembled product is also subject to authorization under SDoC but, in accordance with the applicable regulations, does not require additional testing. This is applicable to personal computers under Section 15.101 (KDB 657217 Personal Computers). Such products shall be supplied, at the time of importation or marketing, with a compliance information statement containing the following information:

- Identification of the assembled product, e.g., name and model number.
- Identification of the authorized modular components used in the assembly. Authorized modular components shall be identified as specified in Section 2.1077(a)(1) for SDoC procedures or Section 2.925 for certification.<sup>10</sup>
- A statement that the product complies with appropriate rules.

<sup>&</sup>lt;sup>5</sup> See 47 CFR §§ 2.1074 and 2.1077. Also, See KDB Publication 896810 for guidance on Supplier's Declaration of Conformity.

<sup>&</sup>lt;sup>6</sup> See 47 CFR § 2.938 for further requirements for test reports.

<sup>&</sup>lt;sup>7</sup> An example of a Supplier's Declaration of Conformity document template is given in Appendix A of KDB Publication 896810 D01.

<sup>&</sup>lt;sup>8</sup> For devices subject to Part 15 and 18 rules, the statements required in Sections 15.19(a)(3) and 18.212, respectively meet the requirements of this rule part.

<sup>&</sup>lt;sup>9</sup> FCC 17-93, docket no. 15-170, para 16. "Given the widespread and effective use of direct internet contact for dialogue between consumers and businesses, we therefore will allow responsible parties the option of providing an internet-based means of contact in lieu of a telephone contact number. …"

<sup>&</sup>lt;sup>10</sup> See 47 CFR §§ 2.1077 and 2.935. Devices subject to certification require an FCC Identifier.

- The identification, by name and address and telephone number or internet contact information of the responsible party who assembled the product from authorized modular components. For devices authorized under SDoC, the responsible party must be located within the United States.
- Copies of the compliance information statements for each modular component used in the system that is authorized under SDoC.

## 2.4 Placement of Compliance Information

Further to Section 2.1077(c), the compliance information must be provided in a form that an end-user can reasonably be expected to have the capability to access, such as the instruction manual, a separate product insert, computer disk, web page, or the device's own electronic screen. Compliance information may be provided electronically as permitted in Section 2.935.

## 2.5 FCC Logo

Devices authorized under the SDoC procedure have the option to use the FCC logo to indicate compliance with the FCC rules, <sup>12</sup> and the logo may be included in the instruction materials or as part of an e-label.



The FCC logo shall only be used on a product that has been tested, evaluated, and found to be compliant in accordance with the SDoC procedures. The use of the FCC logo on the device does not mitigate the requirement to provide a means to uniquely identify the product or to provide the required compliance information statement. The FCC logo cannot be used on products that are exempt from an authorization by rule (*e.g.*, Section 15.103 exempt devices, or Section 15.3 incidental radiators) unless the SDoC procedure has been fully applied for the product.

### 3. CERTIFICATION

For certification, the product shall bear a nameplate or label with the FCC Identifier (FCC ID), as defined in Section 2.925.<sup>13</sup> The FCC ID must always be accessible when using the product. The placement of the FCC ID must be a physical label on the product, unless an e-label is used.

Physical FCC ID labels must be located on the surface of the product, or within a user-accessible non-detachable compartment (such as the battery compartment). The label shall be permanently affixed, permitting the device to be positively identified. The font needs to be readily legible, consistent with the

784748 D01 General labeling and Notification v09r01

<sup>11</sup> Responsible parties as defined in Section 2.909 (47 CFR § 2.909).

<sup>&</sup>lt;sup>12</sup> See 47 CFR § 2.1074(b). FCC logos using other formats, such as those found <a href="https://www.fcc.gov/general/logos-fcc">https://www.fcc.gov/general/logos-fcc</a>, are not appropriate for compliance purposes.

<sup>&</sup>lt;sup>13</sup> See 47 CFR §§ 2.925 and 2.926.

dimensions of the equipment and its label area.

When the device is so small, or for such use that it is impracticable to label with a font size that is four-points or larger (and the device does not utilize electronic labeling), then the FCC ID shall be placed in the user manual, and the FCC ID shall also be placed either on the device packaging or on a removable label attached to the device.

#### 4. ELECTRONIC LABELING

Products with a built-in display, or that only operate in conjunction with another product that has an electronic display, have the option to display on the electronic display the FCC Identifier, any warning statements, or other information that the Commission's rules would otherwise require to be shown on a physical label attached to the device. <sup>14</sup> Guidance for electronic labeling is provided in a separate attachment—see KDB Publication 784748 D02.

#### 5. PACKAGING INFORMATION

Some RF devices are also required to have information included in the packaging of the device (see Appendix A of this document):

*E-Label*. Devices displaying their FCC ID, warning statements, or other information electronically must also be labeled, either on the device or its packaging, with the FCC ID and other information (such as a model number) that permits the devices to be identified at the time of importation, marketing, and sales as complying with the FCC's equipment authorization requirements.<sup>15</sup> This requirement is *in addition to* the electronic labeling of the device. Devices can be labeled with a stick-on label, printing on the packaging, a label on a protective bag, or by similar means. Any removable label shall be of a type intended to survive normal shipping and handling, and must only be removed by the customer after purchase.<sup>16</sup>

*Signal boosters*. The advisories shall be provided in on-line, point of sale marketing materials, in print or on-line owner's manual and installation instructions, on the outside packaging of the device, and on a label affixed to the device.<sup>17</sup>

15 See 47 CFR § 2.935(f).

<sup>&</sup>lt;sup>14</sup> See 47 CFR § 2.935.

<sup>&</sup>lt;sup>16</sup> See 47 CFR § 2.935(f).

<sup>&</sup>lt;sup>17</sup> See 47 CFR § 20.21(f)(1).

## **Change Notice**

**07/11/2014**: 784748 D01 Labeling Part 15 &18 Guidelines v08 replaces 784748 D01 Labeling Part 15 &18 Guidelines v07. Changes were made to reference new guidelines for electronic labeling in the new attachment 7784748 D02 e labeling v01 for e-label guidance.

**04/09/2018**: 784748 D01 General labeling and notification v09 replaces 784748 D01 Labeling Part 15 <u>&18 Guidelines v08</u>. Changes have been made to reflect changes in the rules in accordance with FCC 17-93. Labeling guidance for multi-enclosure transmission-system equipment is added in Appendix A.

**07/02/2018**: 784748 D01 General labeling and notification v09r01 replaces 784748 D01 Labeling Part 15 <u>&18 Guidelines v09</u>. APPENDIX A Section A2 was updated to provide further clarification on the requirements for the Section 15.19(a) statement.

#### APPENDIX A

# COMPLIANCE INFORMATION AND INFORMATION TO USER REQUIREMENTS SUMMARIES

#### A.1 INTRODUCTION

This appendix provides additional guidance on the specific labeling and compliance information for various common products subject to the FCC equipment authorization procedures (SDoC or certification or both). This list in this appendix is not exhaustive of all the compliance information, information to user or display requirements; it provides information about commonly applicable rule parts.

#### A.2 PART 15 COMPLIANCE INFORMATION

Products authorized under Part 15 using SDoC or Certification require a label containing one of the following compliance statements (as specified in Section 15.19(a)):

## (1) Receivers associated with licensed radio service operations:

This device complies with part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference.

## (2) Stand-alone cable input selector switch:

This device complies with part 15 of the FCC Rules for use with cable television service.

## (3) All other devices:

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

For devices approved under SDoC, the Section 15.19(a) labeling requirements for RF devices approved under Part 15 is in addition to the SDoC identification and compliance information requirements of Sections 2.1074 and 2.1077, respectively.

When the device is so small, or for such use that it is impracticable to label it with the required compliance statement in a font that is four-point or larger, and the device is not capable of providing the information electronically (Section 2.935),<sup>18</sup> then the Section 15.19(a) statement shall be placed in the instruction manual. If an instruction manual is not provided or is only available electronically, then the Section 15.19(a) statement shall also be placed on the device packaging, paper insert or on a removable label attached to the device.

As discussed below, Class A and B digital devices are required to include additional statements under Section 15.105. The required statement for Class A or B digital devices will suffice for the Section 15.19(a) statement in the manual. As such it is not necessary to provide both the Section 15.19(a) statement and the Section 15.105 statement in the instruction manual.

<sup>&</sup>lt;sup>18</sup> See 47 CFR § 2.935.

#### A.3 PART 15 INFORMATION TO THE USER

- 1. For devices approved under Part 15, the user's manual or instruction manual for an intentional or unintentional radiator shall caution the user about changes or modifications to the device (Section 15.21).
- 2. For Class A and Class B digital devices, information to the user is required to include the following statements (Section 15.105):
  - For a Class A digital device or peripheral, the instructions furnished to the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

NOTE: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at his own expense.

• For a Class B digital device or peripheral, the instructions furnished to the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

NOTE: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- —Reorient or relocate the receiving antenna.
- —*Increase the separation between the equipment and receiver.*
- —Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- —Consult the dealer or an experienced radio/TV technician for help.

## A.4 PART 18 COMPLIANCE INFORMATION

Products authorized under SDoC and Part 18 required to include a compliance statement similar to the following: 19

"This device complies with Part 18 of the FCC Rules."

The compliance information may be placed in the instruction manual, on a separate sheet, on the packaging, or electronically as permitted in Section 2.935. There is no specific format for this information. The placing of this or similar statement will also comply with the requirements of Section 2.1077(a) (2).

#### A.5 PART 18 INFORMATION TO THE USER

For devices approved under Part 18, information on the following shall be provided to the user in the instruction manual, or on the packaging if an instruction manual is not provided (Section 18.213):

- The interference potential of the device or system.
- Maintenance of the system.
- Simple measures that can be taken by the user to correct interference.
- For RF lighting devices, provide an advisory statement, either on the product packaging or with other user documentation, similar to the following:

This product may cause interference to radio equipment and should not be installed near maritime safety communications equipment or other critical navigation or communication equipment operating between 0.45-30 MHz.

Variations of this language are permitted provided all the points of the statement are addressed, and may be presented in any legible font or text style.

## A.6 CERTIFIED TRANSMITTER MODULES

All standalone modules without an integrated display on the module must be labeled with the module's FCC ID. Only modules with a display can use e-labeling (see also KDB Publication 784748 D02). A host product<sup>20</sup> shall use a physical label stating "Contains Transmitter Module FCC ID: XYZMODEL1," or "Contains FCC IDs: XYZMODEL1, XYZMODEL2," or shall use e-labeling.<sup>21</sup>

## A.7 CERTIFIED SOFTWARE DEFINED RADIO

A software defined radio approved under Section 2.944 may use either permanently affixed labels, or use e-labeling, if the host device has an electronic display.<sup>22</sup>

<sup>20</sup> Any product, system, or equipment that uses a certified transmitter module is referred to as the host.

<sup>&</sup>lt;sup>19</sup> See 47 CFR § 18.212.

<sup>&</sup>lt;sup>21</sup> See 47 CFR § 15.212 and KDB Publication 996369 for other details.

<sup>&</sup>lt;sup>22</sup> See 47 CFR § 2.944.

#### A.8 RF EXPOSURE INFORMATION

In many instances it may be necessary to provide additional information to the user for RF exposure compliance., Such RF exposure user information must be provided either with instructions manual on how the device accessories must be used for RF exposure compliance, or at minimum, instructions on how to reasonably obtain these instructions. RF exposure labeling and notification requirements are specified in Sections 2.1091 and 2.1093.<sup>23</sup> Further guidance for equipment used in general-population/uncontrolled or occupational/controlled environments is provided in various KDB Publications.<sup>24</sup> RF exposure compliance user information may be displayed using the e-labels.

### A.9 SIGNAL BOOSTERS

Guidance on labeling for consumer and industrial signal boosters, and warning label for consumer signal boosters operating under Sections 20.21 and 90.219 is provided in KDB Publication.<sup>25</sup> The user information and notification requirements are also discussed in the KDB Publication.

## A.10 SECTION 20.19 HEARING AID COMPATIBILITY (HAC)

Handsets must clearly display the HAC rating on the packaging material; it is not sufficient to include the information only in an e-label. See the section on user's manual and disclosures in KDB Publication.<sup>26</sup>

## A.11 MULTIPLE-ENCLOSURE AND TRANSMISSION SYSTEM EQUIPMENT

Where a transmission system has a component-device serving as the "main control unit," *e.g.*, the signal source or exciter, conventional FCC ID rules and policies shall be used for affixing the label to that component. For some system configurations, labeling the FCC ID on the system component-device having the main RF output port may apply.

Other component-device enclosures (*e.g.*, a rack) shall not use the same FCC ID label; such enclosures typically are not complete transmitters or transmission systems, nor are they transmitter-control devices. Examples include scenarios where a system contains multiples of the same power amplifiers that are used with broadcast transmitters<sup>27</sup>; or where a multi-carrier power amplifier (MCPA) is used with a cellular/PCS base-station main unit.

Conventional "full-transmitter" FCC ID labeling should not be used on secondary component-devices that are marketed and operated only as part of a specific system.

While not required, system-secondary component enclosures may optionally be labeled by including text "Part of System FCC ID xxxxxx," or similar, where "FCC ID xxxxxx" is the FCC ID labeled on the system primary-device enclosure.

<sup>&</sup>lt;sup>23</sup> See 47 CFR §§ 2.1091(d) and 2.1093(d).

<sup>&</sup>lt;sup>24</sup> See KDB Publications 447498, 616217, 648474 and 941225.

<sup>&</sup>lt;sup>25</sup> See 47 CFR §§ 20.21 and 90.219. Also, KDB Publication 935210 D02 v04 section III0 b) and d).

<sup>&</sup>lt;sup>26</sup> See 47 CFR § 20.19 and KDB Publication 285076.

<sup>&</sup>lt;sup>27</sup> KDB Publication 754507.